

Jason H. Ehrenberg, Esq.
(Admitted *pro hac vice*)
Holon Law Group LLP
442 5th Ave. Suite 2697
New York, NY 10018
(T) 332-253-4992
(E) jehrenberg@holonlaw.com
Attorneys for Defendant Lucas Sirois

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA,

vs.

LUCAS SIROIS,

Defendant

Case No.: 21-cr-175-LEW

CONSENT MOTION FOR EXTENSION OF TIME TO FILE POST-TRIAL MOTION

Defendant Lucas Sirois (“Defendant”), by and through his undersigned counsel, respectfully moves for an extension of time to file his anticipated Fed. R. Crim. P. Rule 33:

1. A jury verdict of guilty on all counts was returned in this case on November 18, 2025;
2. Defendant intends to file a motion for a new trial pursuant to Fed. R. Crim. P. 33.
3. The current deadline for this motions is Tuesday, December 9, 2025;
4. Defendant respectfully seeks an extension of the current motions deadline of three (d) days, until Friday, December 12, 2025.
5. Defendant seeks this extension because counsel injured his back late last week and has been unable to devote sufficient time to the preparation of the Rule 33 motion. Counsel has also been drafting a Rule 29(c) for motion for acquittal and will be filing that motion

this afternoon. The additional three (3) days for the Rule 33 motion would allow counsel to most effectively represent Defendant and would not prejudice the government.

6. Defendant sought the government's consent to the relief requested in this Motion. The government has consented to the relief requested in this Motion.

For these reasons, Defendant respectfully requests an extension of the current motions deadline of three (3) days, until Friday, December 12, 2025.

Dated: December 9, 2025

Respectfully submitted,

HOLON LAW PARTNERS LLP

//s// Jason H. Ehrenberg

Jason H. Ehrenberg, Esq.

(Admitted *pro hac vice*)

Eric Postow

(Admitted *pro hac vice*)

442 5th Ave. Suite 2697

New York, NY 10018

(T) 332-253-4992

(E) jehrenberg@holonlaw.com

and

//s// Mark Dion

Mark Dion, Esq.

Fredette Dion LLC

254 Commercial Street

Portland, Maine 04101

Tel: (207)318-1004

dionmark@me.com

Attorneys for Defendant Lucas Sirois

CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2025, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notice to counsel for all individuals and entities who have entered appearances in this case pursuant to the Court's ECF system:

//s// Jason H. Ehrenberg
Jason H. Ehrenberg